

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
)
SIO2 MEDICAL PRODUCTS, INC. et al,¹) Case No. 23-10366 (JTD)
)
) (Jointly Administered)
)
Debtors.)
)
_____)

AMENDED NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that the undersigned attorneys hereby enter their appearance for A. Enterprises, LLC and Robert S. Abrams (together, “Abrams”) pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon Abrams through their undersigned attorneys as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: SiO2 Medical Products, Inc. (8467); Advanced Bioscience Labware, Inc. (1229); and Advanced Bioscience Consumables, Inc. (2510). The location of the Debtors’ principal place of business and service address in these chapter 11 cases is 2250 Riley Street, Auburn, Alabama 36832.

Chris L. Dickerson
Michael C. Whalen
Michael Jones
Angelika S. Glogowski
PAUL HASTINGS LLP
71 S. Wacker Drive, Forty-Fifth Floor
Chicago, IL 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6127
Email: chrisdickerson@paulhastings.com
michaelcwhalen@paulhastings.com
michaeljones@paulhastings.com
angelikaglogowski@paulhastings.com

Richard J. Cooper
David H. Botter
Luke A. Barefoot
Thomas S. Kessler
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2276
E-mail: rcooper@cgsh.com
dbotter@cgsh.com
lbarefoot@cgsh.com
tkessler@cgsh.com

Matthew G. Summers
Laurel D. Roglen
Margaret A. Vesper
Ballard Spahr LLP
919 N. Market Street, 11th Floor
Wilmington, Delaware 19801-3034
Telephone: (302) 252-4428
Facsimile: (302) 252-4466
E-mail: summersm@ballardspahr.com
roglenl@ballardspahr.com
vesperm@ballardspahr.com

PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Amended Notice of Appearance and Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of Abrams

including, without limitation, (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Abrams are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: June 6, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ Matthew G. Summers

Matthew G. Summers (No. 5533)
Laurel D. Roglen. (No 5759)
Margaret A. Vesper (No. 6995)
BALLARD SPAHR LLP
919 N. Market Street, 11th Floor
Wilmington, DE 19801
Telephone: (302) 252-4465
Facsimile: (302) 252-4466
E-mail: summersm@ballardspahr.com
roglenl@ballardspahr.com
vesperm@ballardspahr.com

Chris L. Dickerson
Michael C. Whalen
Michael Jones
Angelika S. Glogowski
PAUL HASTINGS LLP
71 S. Wacker Drive, Forty-Fifth Floor
Chicago, IL 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6127
Email: chrisdickerson@paulhastings.com
michaelcwhalen@paulhastings.com
michaeljones@paulhastings.com
angelikaglogowski@paulhastings.com

Richard J. Cooper
David H. Botter
Luke A. Barefoot
Thomas S. Kessler.
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2276
E-mail: rcooper@cgsh.com
dbotter@cgsh.com
lbarefoot@cgsh.com
tkessler@cgsh.com

Counsel to A. Enterprises, LLC and Robert S. Abrams